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January 22, 2014

Mr. Don West Environmental Management Support, Inc. 8601 Georgia Avenue, Suite 500 Silver Spring, MD 20910

Re: Application Submitted by the City of Two Rivers, Wisconsin to the U.S. EPA for a Fiscal

Year 2014 Community-Wide Assessment Grants for Petroleum and Hazardous Substance

Brownfields

Dear Mr. West:

The City of Two Rivers, Wisconsin is pleased to submit the enclosed application to the U.S. Environmental Protection Agency (U.S. EPA) for a Community-Wide Assessment Grant for Petroleum and Hazardous Substance Brownfields as part of the U.S. EPA Fiscal Year 2014 Brownfield Grant Competition. Funding is requested in the amount of \$200,000 for petroleum sites and \$200,000 for hazardous substance sites, for a total of \$400,000. Funding will be used during a project period of three (3) years to inventory and assess brownfield properties located within the City, which has a 2010 population of 11,712. Contact information for the project director (Greg Buckley, City Manager) is provided below.

| Name and Title    | Greg Buckley, City Manager   |  |  |  |
|-------------------|--|--|--|--|
| Organization      | City of Two Rivers   |  |  |  |
| DUNS No.          | 00-985-5503  |  |  |  |
| Address           | 1717 E. Park Street<br>Two Rivers, WI 54241  |  |  |  |
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January 22, 2014
Mr. Don West
Environmental Management Support, Inc.
U.S. EPA FY2014 Brownfield Assessment Program

The City of Two Rivers and its residents have been significantly impacted by petroleum and hazardous substance brownfields. A comprehensive inventory of brownfields sites within the City has not been completed to date; however, the magnitude of potential brownfields sites can be inferred from the number of sites identified in various state of Wisconsin and U.S. EPA databases, including nearly 200 leaking underground storage tank (LUST) and environmental repair program (ERP) sites currently included in the Wisconsin Department of Natural Resource (WDNR) Bureau of Remediation and Redevelopment Tracking System (BRRTS) online database, the 65 U.S. EPA regulated sites included in the U.S. EPA's Envirofacts online database, and the one (1) active and archived Superfund sites identified on the CERCLIS online database (all as of October 2010). In addition, there are several highly visible and very large brownfield sites that have been identified by City residents and elected officials as a top priority for cleaning up and removing as a source of blight. The most significant of these are Hamilton Industries, Inc., Seneca Oil, Lesperance Property, Wisconsin Public Service MGP Site, and U.S. Oil Property.

Many of these petroleum and hazardous substance brownfield sites are located adjacent to water resources, within older residential areas and/or near schools, and in the downtown area. Based on information contained on the WDNR's BRRTS database, lead, benzene, PAH's, and trichloroethylene (TCE) were documented in soil and groundwater at multiple properties in the City.

The City has made significant progress over the past 10 years in addressing some of the brownfields properties located near the downtown, enhancing the downtown area, and diversifying the economy away from reliance primarily on the manufacturing sector. The City has adopted a 2010 "Smart Growth" Comprehensive Plan, which identifies addressing several brownfields properties near the downtown and adjacent to the Twin Rivers and the Lake Michigan lakefront as top priorities.

U.S. EPA funding will be used to: (a) complete a community-wide inventory and prioritization of brownfields sites within the City, (b) perform Phase I and Phase II environmental site assessments (ESAs) on priority brownfields sites, (c) additional site investigation and remedial action plan development for select sites for which Phase II ESAs are completed, and (d) community outreach and education related to brownfields and to the assessment grant project.

The City looks forward to continuing the positive working relationship that has been developed with both the WDNR and the U.S. EPA on past projects, as well as further expanding the participation of the various stakeholders and community-based organizations that have provided letters of support included with this application detailing commitments to contribute to the success of the project, and the shared goal of improving the environment and building a better and more sustainable future for the residents of Two Rivers.

The City, together with its partner organizations, looks forward to working with the U.S. EPA on this project. If you have any questions related to the City's proposal, please contact me at your earliest convenience.

Sincerely,

City of Two Rivers

Gregory E. Buckley

City Manager

#### THRESHOLD CRITERIA FOR BROWNFIELDS ASSESSMENT GRANTS

- A. Applicant Eligibility: The City of Two Rivers is a "general purpose unit of local government" as that term is defined in 40 CFR Part 31 and is therefore eligible to receive U.S. EPA funds for assessment of brownfield sites.
- **B.** Letter from Environmental Authority: A letter of support signed by the Wisconsin Department of Natural Resources (WDNR) is presented as Attachment A.
- C. Site Eligibility and Property Ownership Information: Not applicable for proposals for community-wide assessment grants.

# RANKING CRITERIA FOR BROWNFIELDS ASSESSMENT GRANTS 1. COMMUNITY NEED

1.a. Targeted Community and Brownfields

**1.a.i.** Targeted Community Description: The City of Two Rivers has been significantly impacted by brownfields, many of which are located in the central business district (CBD) situated at the juncture of the East and West Twin Rivers and Lake Michigan harbor, where they threaten sensitive environments and the City's water supply. Adjacent to the CBD are older residential neighborhoods where brownfields threaten the health and economic well-being of disproportionate numbers of minority and low-income residents.

Although a formal inventory of brownfield sites in the City has not been completed to date, a review of environmental databases maintained by the Wisconsin Department of Natural Resources (WDNR) and the USEPA document the presence in the City in October 2010 of at least 189 Wisconsin leaking underground storage tank (UST) and Wisconsin Environmental Repair Program (ERP) sites, and one (1) CERCLIS sites. There is also a clustering of the sites in the tracts that contain the highest percentages of minority and economically disadvantaged residents. These areas contain approximately 20 % of the City's total population in a land area of approximately 1.5 square miles, and have a majority of the currently documented LUST/ERP sites, as well a vast majority of the City's CERCLIS sites. Several of the most significant brownfield sites in the City are associated with the Fisher Hamilton and other hydrocarbon sites on the West Twin River which were a major employer in the City for more than 100 years before ending operations in the last decade. Fisher Hamilton left behind a number of vacant manufacturing properties, including over 1.2 million square feet of vacant space in buildings up to 5 stories high.

A significant portion of the petroleum brownfields properties are located within Tax Incremental Finance (TIF) Districts. These TIF districts straddle the East and West Twin Rivers and include a significant portion of historic downtown and the oldest industrial areas of the City, including the Fisher Hamilton, Egger's Industries, and Seneca Oil sites. The TIF districts encompass approximately 10% of the City area. Although an inventory specifically of brownfield sites within these TIF districts has not been completed by the City to date, by definition (under Wisconsin laws regulating TIFs), more than 50% of the real property within the districts is blighted and in need of conservation or rehabilitation work. Based on the history of the area and the current blighted status, it is estimated that at least half the properties in this area would be appropriately labeled as brownfields.

The City's 20-Year Comprehensive Plan (*Comp Plan*), adopted in March 2010, identified 11 Smart Growth Areas (SGAs), the majority of which include brownfields. Many brownfield sites are located within the CBD and older residential areas and/or near schools. For example, numerous historic gas station sites are located directly near schools, parks and recreational areas. Most of these SGAs and other significant brownfield sites in the City are clustered along the East and West Twin Rivers and Lake Michigan. In fact 9 of the SGAs are directly adjacent to the river or lake shoreline and 5 of these are within the CBD.

These brownfields represent not only a major blight, but also a threat to the key environmental receptors and the City's water supply. The rivers have been identified by the WDNR as some of the most polluted rivers in Wisconsin. This is attributable, in part, to the historic heavy industrial complexes operating on the

City's riverfront which prior to the Clean Water Act directly discharged waste to the River. Several of these sites are suspected brownfields, with contaminated groundwater and/or surface water runoff discharging to the rivers. Fish advisories are currently in effect for multiple species due to documented high levels of PCBs, representing a threat to those communities that consume their catch.

**1.a.ii. Demographic Information:** Table 1 presents demographic data for the City. A significant number of the City's residents speak a language other than English at home (based on U.S. Census Bureau data for the year 2010) and a majority of these are believed to be Hmong. The Asian population is overwhelmingly Hmong, an ethnic group from the mountainous regions of China, Vietnam, Laos, and Thailand. Tens of thousands of Hmong refugees immigrated to the United States following the end of the Viet Nam War.

**Table 1 Demographic Data** 

|  | City of<br>Two Rivers | Wisconsin              | U.S.                     | <sup>1</sup> Data is from the 2010 U.S. Census data and is available at http://www.census.gov/.  |  |  |
|--|-----------------------|------------------------|--------------------------|--|--|--|
| Population:                              | 11,712 <sup>4</sup>   | 5,686,986 <sup>4</sup> | 308,745,538 <sup>1</sup> | <sup>2</sup> Data is from the Bureau of Labor Statistics and is<br>available at <a href="https://www.bls.gov">www.bls.gov</a>          |  |  |
| Unemployment:                            | 8.3% <sup>6</sup>     | 7.5% <sup>6</sup>      | 7.2%2                    | <sup>3</sup> Data is from the 2010 ACS and is available at   |  |  |
| Poverty Rate:                            | 12.2%5                | 12.5%5                 | 15.1 % <sup>3</sup>      | http://www.census.gov/newsroom/releases/  *Data from US Census (Quickfacts, 2010), availat   |  |  |
| Percent Minority:                        | 5.5% <sup>4</sup>     | 13.8%4                 | 26.7% <sup>1</sup>       |  |  |  |
| Median Household<br>Income:              | \$42,888 <sup>5</sup> | \$52,627 <sup>5</sup>  | \$49,445 <sup>3</sup>    | http://quickfacts.census.gov/  5 Data from US Census (Quickfacts, 2008-2012 available at http://quickfacts.census.gov/                 |  |  |
| Other:<br>Median Home Value <sup>7</sup> | \$101,800             | \$169,000              | \$181,400                | Data from US Census (Factfinder, ACS, 2008-20 available at <a href="http://factfinder2.census.gov/">http://factfinder2.census.gov/</a> |  |  |
| Pop under 57                             | 5.7%                  | 6.3%                   | 6.5%                     | <sup>7</sup> Data from US Census (Factfinder, 2010 Summar  |  |  |
| Pop 65 and over <sup>7</sup>             | 18.6%                 | 13.7%                  | 13%                      | 1, DP-1), available at http://factfinder2.census.gov/  |  |  |

**1.a.iii.** Brownfields: Numerous brownfields have been identified through our planning efforts to date. With the assistance of USEPA assessment funds we will continue our goals to identify, assess, remediate, and redevelop brownfields in our community. Our *Comp Plan* identified strategic priorities for the CBD as well as a strategy to work in partnership with the Main Street Board, Two Rivers Business Association Board and Plan Commission, area realtors, and developers to promote and encourage redevelopment of brownfields for the betterment of our residents. A few examples of those identified brownfields follow.

Thermo Fisher Scientific factory complex, recently-vacated, comprised of 1.2 million SF of buildings on 12.5 acres of riverfront property in the City's CBD.

Former Eggers Industries plant site, is a cleared industrial site of 3.5 acres located adjacent to the Thermo Fisher property, with residual soil contamination (volatile organic compounds).

A 24-acres site on the West Twin River, located several blocks west of downtown, is comprised of four separate properties that include former petroleum tank farms, a former coal gasification plant and other industrial and warehouse uses.

A 4-acre former industrial warehouse site, overlooks Lake Michigan on a state highway entering downtown.

A 3-mile long abandoned rail corridor, which impacts many potential development sites along that lakefront/highway corridor.

The Fisher Hamilton and Eggers facilities have an historic industrial use manufacturing wood products dating back to the late 1800's. The properties are an important transition area between the CBD and the waterfront and should be redeveloped to promote a strong connection between the downtown and the public access to the riverfront. The properties comprising the 24-Acre brownfield site are all open WDNR ERP sites with VOC and petroleum soil and/or groundwater contamination. The site has wetland and floodplain delineations. All of these sites are appropriate for mixed use development, with a combination of residential, commercial and park/open space uses. Redevelopment alternatives will depend upon the environmental findings and evaluations.

**1.a.iv.** Cumulative Environmental Issues: Contaminated brownfields represent not only a major blight, but also a threat to the key environmental receptors and the City's water supply. The rivers have been identified by the WDNR as some of the most polluted rivers in Wisconsin and both the rivers and harbor are 303dlisted impaired waters. Fish advisories are currently in effect for multiple species due to high levels of PCBs, representing a threat to those communities that consume their catch. This is attributable, in part, to the historic heavy industrial complexes operating on the City's riverfront which prior to the Clean Water Act directly discharged waste to the River. Several of these sites are suspected brownfields, with contaminated groundwater and/or surface water runoff discharging to the rivers.

1.b. Impacts on Targeted Community: As discussed in 1.a.ii. above, the City's Hmong in many cases have maintained components of their agrarian culture including raising vegetables in urban gardens and catching fish for consumption from the East and West Twin Rivers. These practices, combined with low literacy rates, make them particularly susceptible to ingestion of environmental contaminants and associated health risks. The Hmong community is concentrated in areas in the TIF districts and adjacent to the East and West Twin Rivers. A 2001 study by the University of Wisconsin-Extension (<a href="http://www.apl.wisc.edu/publications/HmongChartbook.pdf">http://www.apl.wisc.edu/publications/HmongChartbook.pdf</a>) found that 57% of Wisconsin's Hmong population was under age 18. This study also found that over 25% of the Hmong residents surveyed stated that they spoke limited or no English. Furthermore, a census of schoolchildren completed by the Wisconsin Department of Public Instruction in March 2008, classified 250 Hmong schoolchildren attending the Two Rivers Public School System as being Limited-English Proficient. Individuals with limited English skills are often economically disadvantaged and concentrated in lower rent neighborhoods, that (at least in the case of Two Rivers) are in areas with high numbers of potentially contaminated sites, putting these individuals at increased risk of exposure to lead and other types of contamination and the associated health hazards.

A 2007 study by the National Center for Environmental Health Center for Disease Control and Prevention, documented that Wisconsin has a higher percentage of adults self-reporting asthma (9.2%) than the U.S. as a whole (8.2%), with the discrepancies greatest in the 25 to 34 year age range (14.3% in Wisconsin versus 8.1% for the U.S.), and the older than 65 age range (8.8% versus 7.5%). The elderly have more health problems and greater difficulties in affording health care than other segments of the population. This puts them at increased risk from the additive health effects, including asthma, which can be partially attributable to exposure to environmental contaminants, associated with brownfield sites and/or abandoned buildings. As can be seen in the demographic table below, the City has a comparatively greater proportion of older adults to state and national populations, with comparable numbers of children and poverty level individuals.

Negative trends are evident in median household income and home value. Median income is significantly lower in areas with the largest concentrations of brownfields. Although the causes for these trends are complex and multivariate, the presence of a greater concentration of contaminated sites, vacant buildings, and brownfields unquestionably is a contributing factor to the lower home values and population trends.

#### 1.c. Financial Need

1.c.i. Economic Conditions: State imposed limits on municipal levies have left little excess tax revenue for the City to use to assess brownfield sites. Due to the relatively small size of the area, any geographic advantages associated with brownfields sites near the CBD are not great enough to enable these sites to compete with greenfield development sites located in other areas of the County, and metropolitan areas outside of the City limits. Local property tax dollars are not be available for assessment and cleanup activities at these sites as the City has relied on cost-cutting efforts to remain solvent. The State deficit has resulted in an acceleration of a long-term trend of decreases in shared revenues provided to the City by the State, further straining the City's ability to self-fund or participate in the brownfields assessment projects without USEPA assistance. The City is however currently undertaking efforts to have a significant portion of the East Twin River corridor deemed "blighted" in an effort to facilitate funding availability through the CDBG program for the defined corridor.

The unemployment rate in Two Rivers increased dramatically during the current economic downturn, reaching a peak of over 10% in January 2010, which represents one of the highest unemployment rates amount the 30 largest cities in Wisconsin, and compares to a rate of less than 4% a decade earlier. As manufacturing has been one of the sectors of the U.S. economy that has been most severely impacted by the current economic downturn, this has resulted in a disproportionately severe economic impact on the residents of the City. Although data are not provided for the City, Manitowoc County (where more than 30% of residents are employed in manufacturing businesses) has been particularly battered, as reflected by a 76% increase in food stamp usage from 2007-2009. The percentage of African American residents receiving food stamps of 50% is the second highest for any county in Wisconsin, and is an indicator of the distress among the targeted population groups concentrated in the areas with the greatest number of brownfields. Many Two Rivers residents are dealing with decreased economic opportunities. Several local manufacturing companies, such as Fisher Hamilton, Eggers Industries, Formrite Industries have experienced considerable downturns in business, and their layoffs or closings have had a major impact on the community. Local government has not escaped the layoffs, as demonstrated by the 2009 layoff of 35 workers from the Manitowoc County Highway Department to address budget shortfalls. 1.c.ii. Economic Effects of Brownfields: One of the most significant economic impacts from brownfields has been the loss of property tax revenue that might otherwise have been generated by the productive use of now abandoned, vacant or underutilized properties. In addition, the blight associated with these properties has in many instances reduced the valuations for neighboring properties, resulting in a further loss of tax base and property tax revenue. Between 2009 and 2010, the equalized valuation of the City's real property declined by approximately 4% (State-wide, the decrease was 3.13%). Another important economic cost has been opportunity costs associated with desirable projects that would have added jobs, amenities, or tax base, not coming to fruition as a result in part to liabilities, costs, and potential delays associated with contamination uncovered during the due diligence phase of these projects.

The former Fisher-Hamilton facilities are probably the most blatant example of the economic impact of brownfields on Two Rivers and its residents. The initial economic impact was the loss of an estimated \$12,000,000 in annual wages and benefits associated with the relatively high wage manufacturing jobs that were lost. Although the City is actively pursuing USEPA and other funding to help pay for future environmental assessment, environmental cleanup, asbestos abatement, and demolition costs associated with this facility, it is unlikely that more than \$1 million in total will be available from these or other existing brownfields funding sources, and therefore the City will end up having to pay the vast majority of costs which are estimated in the millions for asbestos abatement and demolition alone at this single brownfield site.

#### 2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS

#### 2.a. Project Description

**2.a.i.** Project Description, Alignment with Land Use and Revitalization Plans, and Redevelopment Strategy: The City has worked hard over the past decade to maintain its infrastructure, pursue business growth and expansion opportunities, and improve the appearance of the downtown area to make it a more attractive destination for visitors. These improvements provide the foundation for continuing revitalization and reinvestment in the community at large and in the downtown area as a regional retail, government, cultural, service center, and tourist destination.

The City's Comp Plan (http://www.two-rivers.org/compplan/), recognizes the need to aggressively pursue redevelopment of blighted properties to maintain the fabric of the traditional community, make efficient use of public infrastructure and maintain property values. The redevelopment strategy will be formulated in accordance with the City's adopted planning documents, including the Comp Plan and the 2013 Harbor Master Plan (Harbor Plan). Many of the sites identified in these documents are within this

proposal's targeted community and align with the city's desire to redevelop its waterfront and pursue commercial revitalization of former industrial sites. The City will seek to address identified environmental issues in a cost-effective manner, including capping contaminated areas on-site where appropriate. Redevelopment within these blighted SGAs will re-use land already developed, minimize the need for new infrastructure, and help to revitalize older neighborhoods.

**2.a.ii. Project Management Approach:** The City has planning, engineering, legal, and other staff with the proven experience and expertise to both manage the brownfields assessment grant project, and to provide support services as necessary to move the prioritized brownfields sites from the initial assessment and planning phase through with the complete redevelopment process. A Brownfields Steering Committee will be formed with representatives from the City, environmental agencies or health organization partners, and community based organizations that have agreed to act as partners on this project.

The goals for this brownfield program include to: (a) identify and prioritize brownfields located throughout the City, (b) reduce threats to public health and the environment associated with these sites, (c) reduce sprawl and preserve green space by facilitating redevelopment of brownfields as alternatives to greenfield sites, and (d) improve economic conditions through creation of jobs, leveraging of public and private investment, and increasing the tax base through cleanup, rehabilitation and/or redevelopment of brownfield sites. The key project outcomes are expected to include (a) establishment of an effective and sustainable brownfields program, (b) completion of environmental assessment activities for at least four (4) priority brownfield sites, (c) leveraging an average of \$20 of private investment for each \$1 of assessment grant funding utilized, resulting in the creation of at least \$5 million of increased tax base attributable in part to the assessment grant, and (d) creation of at least 50 temporary construction jobs and 50 permanent jobs associated with redevelopment projects occurring on sites assessed using USEPA funds.

The following elements or activities will be tracked and used to measure progress: (a) number and land area (acres) of brownfield sites identified and prioritized, (b) number of Phase I ESAs, Phase II ESAs, site investigations, and remedial action plans completed, (c) amount of public and private funding leveraged for investigation, cleanup, and redevelopment of sites assessed, (d) increases in property values on sites assessed for which subsequent cleanup and/or redevelopment occurs, (e) increases in property values occurring on neighboring properties, (f) level of participation by community partners, as measured by the number of meetings held, number of participants from each organization, and the number of hours volunteered, (g) level of public participation as measured by the number of community meetings held and attendance, (h) media coverage. The following intermediate outcomes or milestones will be tracked for each site targeted for assessment: (a) completion of assessment activities; (b) approval of remedial action plans by the WDNR; (c) identification and acquisition of funds to perform environmental cleanup; (d) development of redevelopment plans; (e) acquisition of the properties by the City or a developer; (f) issuance of development proposals (for parcels owned by the City); (g) successful negotiation of development agreements and/or approval of specific redevelopment proposals; (h) the start and completion of required street and/or infrastructure improvements; (i) the start and various stages of completion of new construction or renovations; and (j) occupancy of the completed development. Progress towards achieving these outcomes and outputs will be reported to USEPA as part of the required quarterly and annual progress reports. The expected Project outcomes and outputs will be included as part of the information presented on the City's website, and as part of status reports shared with the brownfield advisory committee and other Project partners. The tracking information will be updated on at least a quarterly basis and made available to the public on the City's website.

2.a.iii. Site Selection Prioritization, Site Selection, and Access: The inventory should help to identify and focus attention on sites that are most significant in terms of potential public health impacts, potential impacts to critical environmental receptors such as the East and West Twin Rivers, concerns of residents or local

government representatives, and/or of interest by the development community. Following completion of the inventory activities described below (2.b.), sites will be prioritized for assessment based on input from the Brownfields Steering Committee. Factors to be used in prioritizing sites will include: (a) long-term and short-term economic development potential/opportunities; (b) known or suspected threats to public health; (c) degree of known or suspected environmental impacts; (d) degree of blight or underutilization; (e) tax delinquency status; and (f) community concerns. Providing opportunities for meaningful input from City residents and the affected community will be a key component of the prioritization process. City staff will work with the site owners, the consultant and the legal advisor to ensure access agreements are in place.

**2.b.** Task Description and Budget Table: The following breakdown will apply equally to both petroleum and hazardous substance brownfield sites. Please see Table 2 for the complete grant request budget.

<u>Task 1: Brownfields Inventory</u> – The City will complete a comprehensive inventory of existing and potential petroleum brownfields properties located throughout the City. As part of the inventory, the City will acquire metadata and geographic information as necessary to integrate brownfields data into the City's GIS which will aid in evaluation of the data as well as provide a tool for a wide range of brownfields and other planning activities. Upon completion of the initial inventory, sites will be prioritized for assessment based on input from the Steering Committee. The inventory will integrate and incorporate information from existing environmental databases, as well as collect additional data through the following activities to be performed as part of this task:

- Conducting tours and inspections for all industrial and commercial areas in the City to visually assess
  the properties for blight, vacancy or underutilization, sale signs, possible improper storage of waste
  materials, and/or evidence of out-of-service USTs still in place.
- Review select City records that are potentially relevant to categorizing sites as brownfields (such as
  occupancy and other type of permit records, tax delinquency status, building code violations).
- Review historical Sanborn fire insurance maps to identify historic industrial sites and commercial sites
  such as dry cleaners and gas stations, where there is a high probability of historic releases of
  contaminants to the environment. If feasible, scanned images of the maps will be acquired, the
  individual commercial or industrial sites, shown on the maps geo-referenced, and the data integrated
  into the City's GIS as one or more data layers.
- Conduct a survey of local commercial and industrial real estate professionals to obtain information on sites in the City that are either on the market (but unsold) or off the market (in spite of an interest by the owner to sell) due to known or feared environmental liabilities.
- Review all tax delinquent industrial and/or commercial properties in the City to determine which sites
  may be brownfields, and to identify priority candidates for assessment grant funding.
- Review County health department records to verify that all sites with known or suspected impacts or threats to public health are being included in the evaluation/prioritization process.

This task will be allocated \$12,000 of the grant budget. The contractor budget of \$10,000 is based on an estimated 100 hours of work by the consulting firm to assist with the inventory at an anticipated average billing rate of \$100 per hour. The \$2,000 budget for supplies includes \$1,500 for acquisition of historical plat maps, city directories, and other historical records from an environmental data information service, and \$500 in photocopy and other costs associated with obtaining records from other sources. The City's GIS staff will maintain the details of attributes within the GIS using the software. This work will include expansion of the City's GIS system as described previously in this grant application.

<u>Task 2: Phase I Environmental Site Assessments (ESAs)</u> – The City will contract with an environmental consulting firm to complete at least 5 Phase I ESAs at high priority brownfield sites. A limited number of Phase I ESAs are being proposed in anticipation that the brownfields assessment program will include 1 or more large or complex brownfield sites for which extensive historic documentation will

need to be reviewed as part of the assessment process. Both printed paper and electronic copies (Adobe PDF files) will be created for each Phase I ESA report. The electronic copies will be linked to other site information in the City's GIS.

This task will be allocated \$25,000 of the grant budget. It is assumed that the Phase I ESAs will be completed by the consultant at an average cost of \$4,500 (\$22,500 total). A somewhat higher than typical Phase I ESA cost is budgeted for this task in anticipation that the sites targeted for assessment are likely to include 1 or more large or complex brownfield sites with a significant amount of existing documentation that will need to be reviewed as part of the Phase I ESA process. In addition, budget is included in this task for assistance to be provided by the consultant in preparation of the eligibility determination requests, at an assumed average cost of \$500 per request (\$2,500 total). Phase I ESAs will meet the requirements of USEPA's All Appropriate Inquiries Final Rule, and will follow the standards set forth in the American Society of Testing and Materials ASTM E1527-13 Phase I ESA Process.

<u>Task 3: Phase II ESAs</u>, <u>Site Investigations</u>, <u>and Remedial Planning</u> – The City will contract with a qualified environmental consulting firm to perform Phase II ESAs, supplemental assessment activities, site investigations, and/or remedial planning on select parcels for which Phase I ESAs are completed, and where a need for further assessment is identified. It is anticipated that Phase II ESA, site investigation, and/or remedial planning activities will be conducted on at least 4 sites. It is anticipated that several of the Phase II ESAs will document the presence of significant environmental impacts, and require additional investigation activities beyond the initial Phase II ESAs, to meaningfully advance the sites towards environmental cleanup and redevelopment.

This task will be allocated \$156,000 of the grant budget. For the purpose of developing an initial allocation of budget for this task, it was assumed that the sites targeted for assessment would include 2 large and complex brownfield properties (requiring a greater allocation of the budget) and 2 small or "simple" brownfield sites. Based on this assumption, the outputs, deliverables, and costs for this task will include preparation or completion of:

- One quality assurance project plan (QAPP) at an estimated cost of \$8,000;
- Four site-specific sampling and analysis plans and site specific health and safety plans at an average cost of \$1,000 (\$4,000 total);
- Two Phase II ESAs for "complex" sites at an average cost of \$25,000 (\$50,000 total);
- Two Phase II ESAs for "simple" sites at an average cost of \$12,500 (\$25,000 total);
- Two supplemental Phase II ESAs/site investigations at an average cost of \$20,000 (\$40,000 total); and
- Two remedial action plans at an average cost of \$8,000 (\$16,000 total).

In addition, \$13,000 is allocated as part of this task for assistance to be provided by the consultant with preparation of quarterly and annual reports, and other planning activities to be performed by the consultant in support of execution of the assessment tasks outlined above (i.e., assistance with access agreements, permit applications required for assessment work at specific sites targeted for assessment).

<u>Task 4: Community Outreach and Involvement</u> — To assure that City residents and other stakeholders have meaningful participation in the project, and their concerns are effectively identified and fully considered, community outreach activities will be the most public and inclusive portion of the project. This will involve public meetings and forums, development of marketing and informational materials, joint outreach and education efforts with community partner organizations, and other activities, as detailed in later sections of this grant application.

This task will be allocated \$7,000 of the grant budget. To keep community residents and other stakeholders informed throughout the project as well as to assure that they are provided with opportunities for meaningful input at key points during the project, a comprehensive community involvement plan will be implemented. Activities that will be performed as part of the plan will include issuance of public notices,

mailings, website development, developing and printing fact sheets, and holding public meetings with residents. The budget includes \$3,000 for the City to contract with a consulting firm familiar with public relations to perform facilitated community outreach meetings. The budget includes \$2,050 for travel, fees and lodging expenses required for City staff to attend 2 USEPA National Brownfields Conferences, and participating in environmental assessment or redevelopment workshops or training sessions. Travel costs are estimated assuming attendance by the project manager (Greg Buckley and/or designee) at two, 4-day brownfield conferences, with airfare costs of \$500 per conference (\$1,000 total), and daily expenses for hotel and meals of \$120 per day (\$960 for 8 days), and \$15 per day for incidentals (taxi rides, parking, seminar fees, etc., \$90 total). Budgeted supply costs for Task 4 include \$750 for meeting space rental, \$300 for printing costs, \$400 for mailing expenses associated with public notices, and \$500 for display boards and similar graphic displays for use at public meetings.

Table 2 Budget Table

| Petroleum Ass        | sessment Grant Project         |                       |   |                           |           |
|----------------------|--------------------------------|-----------------------|---|---------------------------|-----------|
| Budget<br>Category   | Task 1<br>Brownfield Inventory | Task 2<br>Phase I ESA | Task 3<br>Phase II ESA, SI, RAP         | Task 4 Community Outreach | Total     |
| Travel               |                                |                       |   | \$2,050                   | \$2,050   |
| Equipment            |                                |                       |   |                           |           |
| Supplies             | \$2,000                        |                       |   | \$1,950                   | \$3,950   |
| Contractual          | \$10,000                       | \$25,000              | \$156,000                               | \$3,000                   | \$194,000 |
| Other                |                                |                       |   |                           | Í         |
| Total                | \$12,000                       | \$25,000              | \$156,000                               | \$7,000                   | \$200,000 |
| Estimated # of Sites |                                | 5                     | 4                                       | NA                        | NA        |
| Hazardous Ass        | sessment Grant Project         |                       |   |                           |           |
| Budget<br>Category   | Task 1 Brownfield Inventory    | Task 2<br>Phase I ESA | Task 3<br>Phase II ESA, SI, RAP         | Task 4 Community Outreach | Total     |
| Travel               |                                |                       |   | \$2,050                   | \$2,050   |
| Equipment            |                                |                       | *************************************** |                           |           |
| Supplies             | \$2,000                        |                       |   | \$1,950                   | \$3,950   |
| Contractual          | \$10,000                       | \$25,000              | \$156,000                               | \$3,000                   | \$194,000 |
| Other                |                                |                       |   |                           |           |
| Total                | \$12,000                       | \$25,000              | \$156,000                               | \$7,000                   | \$200,000 |
| Estimated # of Sites |                                | 5                     | 4                                       | NA                        | NA        |

All contractual services will be procured in accordance with the requirements of 40 CFR 31.36. USEPA grant funds will <u>not</u> be used for administrative costs as defined in the Proposal Guidelines. No budget is being requested for salary or benefits for City employees, and therefore these cost categories were not included on the table.

2.c. Ability to Leverage: The City has used multiple funding mechanisms in the past to complete necessary tasks on brownfield sites targeted by the City for redevelopment, and will utilize these and other funding resources to ensure the successful revitalization of sites assessed using the USEPA grant. The City has successfully secured and utilized brownfields site assessment grants available from the WDNR. The agency's Plant Recovery Initiative and Ready for Reuse programs provide assistance with brownfield investigations and cleanup. The Wisconsin Economic Development Corporation (WEDC) has several brownfield and redevelopment programs the City would explore for environmental cleanup on brownfield sites, such as the Site Assessment Grant, the Brownfield Program, Idle Industrial Sites Redevelopment

Programs, and the Community Development Investment Grant. The City is eligible for these grants and can also work with developers or private companies as appropriate to secure grants for brownfields sites being redeveloped in the City. In 2012, working with the WEDC, the City completed a blight determination for underutilized and potentially contaminated properties adjacent to the East Twin River. The study assisted in obtaining a \$500,000 CDBG-Public Facilities award to replace an underwater watermain in conjunction with the seawall repair project and will allow the City to apply for other funding to facilitate the redevelopment of underutilized and contaminated properties in the future. The City would look to these programs as a potential source of funding if needed for additional assessment, or cleanup of those sites assessed using the USEPA grant.

Another key source of funding available to the City is TIF funding. The City has the capacity to establish additional TIF Districts, and has successfully used TIF funds in the past for the purpose of soil and groundwater cleanup, demolition of buildings, and infrastructure improvements needed to support brownfields redevelopment. Numerous underutilized, blighted and potentially contaminated sites are included within the City's TIF districts. The City will also evaluate and utilize Industrial Revenue Bonds (IRBs) where applicable.

#### 3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

**3.a. Plan for Involving Targeted Community & Other Stakeholders; and Communicating Project Progress:** The community engagement plan will build on recent efforts used in updating the City's *Comp Plan* which successfully engaged residents and other stakeholders. Using a similar approach, the City will provide the community with information about the community-wide assessment project and solicit and process public input regarding Project activities. The City will also work closely with the numerous community-based organizations (CBO) that have volunteered to serve as partners for the Project, as detailed below (**3.c.**).

Following the grant award announcement, the City will draft a press release for circulation in the local newspaper, the Herald-Times-Reporter, which has provided extensive coverage of past planning activities related to redevelopment projects. Additionally, advertisements will be placed on local radio stations, as well as local access television, to reach the non-subscribers and those without internet service. The City will schedule at least two public kick-off meetings to inform citizens and stakeholders about the Project. The City will rely on the Chamber of Manitowoc County, and the Economic Development Corporation of Manitowoc County (EDCMC) to help notify the business community and developers of these meetings. The Hmong Community Center of Manitowoc County (HCCMC) will assist with organizing attendance by members of the Hmong community, as well as representatives of the 25 local grass roots organizations and service providers that meet monthly with the HCCMC and work together to address the needs of the minority communities and other local residents. During the meetings, the City will provide the community with background information on the Project, and solicit public input regarding health and welfare issues and redevelopment opportunities. Meetings regarding sites eligible for assessment activities will be held before site activities are initiated to familiarize stakeholders with the rationale for selection of the target site(s) and outline what to expect during and after the assessment process.

The City will continue periodic public dissemination of information about the Project, and solicit community involvement at each stage of assessment, cleanup, and redevelopment of targeted brownfield sites. The City will report on the Project progress at open forums, such as municipal board and council meetings and will also disseminate information through the City's website, newsletters, direct notice to community organizations (written, telephone, e-mails, etc.), and local newspapers. During various phases of the program, the types of community involvement will differ, although the same methods will be involved. When sites are identified for assessment, the primary information flow will be outward to the community, notifying local stakeholders about assessment activities that will occur, providing results of the assessments, and explaining health and environmental impacts of findings. If potential health threats to the community are identified, the Manitowoc County Health Department (MCHD) will become a partner in community

involvement and education. The intensive "information out, feedback in" process will continue throughout the cleanup and redevelopment decision-making process.

Although it is anticipated that a majority of project communications will be in English, the City will work with the HCCMC to develop and distribute information on the brownfields program in Hmong. The HCCMC will also support the City in a variety of other forms of outreach to the Hmong community related to the brownfields program.

#### 3.b. Partnerships with Government Agencies

3.b.i Local/State Environmental and Health Agencies: The City will continue its existing partnership with the WDNR to help ensure appropriate assessment and cleanup of brownfield sites. Environmental investigation, monitoring, and remedial planning activities will be conducted in compliance with the rules and guidance promulgated by the WDNR under the Chapter NR700 Rule Series, Chapter NR746 (for petroleum sites), and other Wisconsin regulations as applicable. The City will coordinate with WDNR staff for technical support, resolution of regulatory or procedural issues, and interpretation of rules and guidance documents.

The MCHD will continue to be involved in protecting public health and the environment during the City's assessment, cleanup, and redevelopment of brownfield sites. If contamination discovered through assessment of brownfields has the potential to negatively impact the health of local residents (especially as related to off-site exposures that would not be the responsibility of a non-liable developer), the City will notify the WDNR and MCHD, who will become Project partners. Based on previous discussions with the MCHD, no disease or symptomatic clusters indicative of environmental health issues or related target contaminants associated with brownfields have been identified in the City to date.

**3.b.ii. Other Relevant Federal, State, and Local Governmental Agencies:** Finally, it is anticipated that the WEDC and WDNR will continue to serve as a key partners in facilitating redevelopment of brownfield sites, through funding programs such as the Brownfields Program, the Petroleum Environmental Cleanup Fund Act (PECFA) Program, and State of Wisconsin CDBG Small Cities awards, all of which have been used to facilitate redevelopment of multiple brownfield sites in the City.

**3.c.** Partnerships with Community Organizations: The City has obtained commitments from 5 CBOs to serve as active partners in the Project as described below. Letters of support and commitment from the following organizations and others affirming these roles and their participation are provided in **Attachment B**.

Chamber of Manitowoc County (Karen L. Szyman, Executive Director, 1515 Memorial Drive, Two Rivers, WI 54220. Phone: 920-684-5575): The Chamber of Manitowoc County (Chamber) has been serving the community since 1916, with an emphasis on supporting area businesses, and promoting tourism. The Chamber has agreed to assist the City by having 1 or more representatives participate in the brownfield advisory committee, and in assisting with distribution of information on the grant, in particular to the business community, through posting of information in the Chamber's weekly newsletter and on its website.

Economic Development Corporation of Manitowoc County (EDCMC) (Andrew Steimle, President, 202 N. 8th Street, Manitowoc, WI 54220. Phone: 920-482-0540): The EDCMC provides business development support services for businesses in the County, in the areas of business development, entrepreneurial development, business attraction and recruitment, as well as community and workforce initiatives. The EDCMC has agreed to assist the City in the following ways: (a) through distribution of information on the grant program through articles in their newsletter and posted on their website, (b) by having 1 or more members of the EDCMC serve on the brownfield advisory committee, and (c) by providing business recruitment/technical assistance to companies that potentially interested in redeveloping or reusing sites targeted for assessment.

**Hmong Community Center of Manitowoc County (HCCMC)** (Nyia Long Yang, Executive Director, 1517 Washington Street, Manitowoc, WI 54220. Phone: 920-684-1228): The HCCMC, established in 1989, is part of a Two Rivers area consortium of over 25 local grass roots organizations and

service providers that meet monthly and work together to address the needs of the minority communities and other local residents. The HCCMC has agreed to a participate in the brownfields program by: (a) having a staff member serve on the brownfield advisory committee, (b) hosting of 1 or more neighborhood meetings related to the Fisher Hamilton brownfield site, (c) distribution of information related to the brownfields program in through a variety of methods, with translation into Hmong, and (d) distribution of information to other grass roots organizations and service providers via the consortium.

Lakeshore Technical College (Michael A. Lanser, President, 1290 North Avenue, Cleveland, WI 53015. Phone: 920-693-1000): Lakeshore Technical College's (LTC) mission is focused on strengthening the area economy by helping to train a workforce that is skilled, diverse and flexible. LTC has agreed to participate in the project by having one or more staff serve on the brownfield advisory committee. LTC will also evaluate potential internships, student projects, and class activities related to brownfields that could provide support with different components of the project such as development of the GIS inventory of brownfields sites.

Woodland Dunes Nature Center and Preserve (Jim Knickelbine, Executive Director, 3000 Hawthorne Ave. Two Rivers, WI Phone: 920-793-4007): Woodland Dunes Nature Center and Preserve is an oasis of globally significant wildlife habitat located between Manitowoc and Two Rivers, Wisconsin. The mission of Woodland Dunes is to protect and manage its globally important wildlife habitat so as to maintain its ecological integrity, and to involve the community in a greater understanding of natural resources through education, programmed events, and experience in our preserve. Woodland Dunes is committed to contribute staff/member time to assist with an advisory committee, and would offer the use of our facilities to host meetings and the like.

Additional organizations will be pursued to bring additional areas of expertise into the project coordination and implementation efforts.

#### 4. PROJECT BENEFITS

4.a. Health and/or Welfare and Environment: The City expects the environmental and public health benefits associated with the assessment and eventual cleanup and redevelopment of its brownfields to include reduced exposure of residents (especially children, elderly, and low income) to contaminants present at brownfields properties, improved groundwater quality, a healthier East and West Twin Rivers and near shore waters of Lake Michigan, safer land surfaces, and better air quality. The assessment grant will support characterizing brownfields in the City in an organized and comprehensive manner. This process is critical in identifying sites that may pose a threat to human health and the environment. The City's brownfields pose threats by exposing the public to documented and undocumented areas and types of contaminants within soil, groundwater, or within hazardous building materials. Threats to residents can be mitigated by bringing these sites and hazardous building materials to the public's attention and completing site assessments designed to identify the presence and extent of contamination, followed by direct remediation/abatement and/or redevelopment to reestablish site control through engineering and/or institutional controls. The grant can improve public awareness of brownfields and their associated health risks, including residents (such as the Hmong) who have limited English proficiency. This is especially important in the impoverished neighborhoods near the downtown area where the Hmong and other low-income, minority, and/or sensitive populations have grown accustomed to brownfields and may not view them as unusual or dangerous.

The assessment grant will also support the City's efforts to protect and enhance the East and West Twin Rivers. The assessment of sites along the banks of the Rivers will allow the City to determine if contaminated soil and groundwater is impacting the water and sediment quality in the River, posing an ecological threat to fish and other aquatic organisms, or to the City's water supply which is derived from intake pipes in Lake Michigan within 2,000 feet of where the East and West Twin Rivers enter Lake Michigan. Any pollution entering the Rivers represents a potential threat to the near shore waters of Lake Michigan and therefore the City's water supply. If migration of contaminants to the Rivers is documented,

the City can utilize the assessment grant funds to assess and develop feasible clean-up or control options. The redevelopment of sites near the River, in conjunction with improved area storm water management practices will limit uncontrolled, potentially contaminated runoff from entering the Rivers. This will improve the ecosystem, protect threatened species such as Lake Sturgeon, and benefit both environmental receptors and residents seeking to enjoy the River's recreational opportunities.

The grant will also support the City's efforts to protect the health of children and other sensitive populations attending school or living in close proximity to brownfields. For example, children are at risk of exposure to TCE, lead, PAHs, and other contaminants present at multiple former gas station sites located adjacent to the schools. The assessment of these sites will document the extent of on-site and off-site contamination and provide data by which to identify and plan remedial actions that can protect the children and neighboring residents.

Measures to protect area residents from contaminants during the assessment process will be implemented. Residents in areas bordering a site targeted for assessment will be notified in advance of the planned assessment activities by mail or other means and provided with contact information in the event they have questions before, during, or after the assessment process regarding: (a) known or suspected risks, (b) findings, or (c) other issues/concerns. Appropriate measures to control site access will be identified as part of each site-specific sampling and analysis plan. Dust control measures will be implemented as appropriate at sites with known or potential contamination present at or near the ground surface or within exposed building components. Notices will be posted at the entrance to assessment sites prior to and during the assessment process with contact information for area residents and other passersby. Investigative wastes will be stored, characterized, managed, and disposed of in a manner that is protective of public health, complies fully with applicable State and Federal regulations, and in accordance with procedures detailed in the QAPP and the SAPs.

#### 4.b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

4.b.i. Foster and Implement Sustainable Redevelopment: The USEPA grant will provide environmental benefits by funding assessment activities that support brownfield redevelopments and that reduce pollution and resource consumption through infrastructure re-use. Many of the City's brownfields consist of abandoned or vacant industrial buildings and empty commercial structures, which are currently serviced by infrastructure (e.g., water and sewer, electricity, natural gas, and roads) sufficient to support their redevelopment and reuse. Many of these buildings are structurally sound and only require remodeling and updating to be ready for reuse. The assessment grant will support the reuse of the buildings on these brownfields, reducing the amount of energy and resources required for new construction or required to extend utilities to undeveloped areas. The City's Comp Plan provides a framework whereby any new development occurring on brownfields properties will fit in with the desired long term vision for the City, and incorporate sustainable design practices. These new manufacturing businesses are more sustainable and less likely to pollute than older, heavy manufacturing industries they replace; therefore, reuse of these sites will not pose a threat of new environmental impacts and possible renewed status of sites as brownfields in the future. New manufacturing industries in the City generally will be directed to designated industrial parks, developed with existing infrastructure, where new or rehabilitated facilities, designed and operated in compliance with modern environmental regulatory requirements, are far less likely to result in environmental impacts.

Wherever possible, the City will encourage green building techniques and sustainable, native plantings in landscaping. The City's goal is to facilitate the redevelopment of blighted and contaminated properties. The restoration of these properties not only eliminates blight, but also enhances the environmental quality of the neighborhood through in-fill developments that increase surrounding property values. The reuse of these brownfields will also reduce uncontrolled areas of surface contamination that may be impacting storm water runoff to regional water bodies. The City is dedicated to the promotion of sustainable development, particularly in the reuse of brownfields, as a primary approach for protecting and enhancing the natural

waterways in the City. The USEPA funding will allow the City to initiate assessment of brownfield sites located along the East and West Twin Rivers and Lake Michigan. Potentially contaminated storm water from brownfield sites currently flows uncontrolled into these sensitive waterways. By conducting assessments of these sites, the City can begin the process of encouraging sensible redevelopment, including promoting use of innovative storm water management techniques such as constructed wetlands and swales, which will in turn reduce runoff of impacted storm water.

**4.b.ii. Integration of Equitable Development or Livability Principles:** In its planning and community development activities, the City has emphasized redevelopment within its existing boundaries as a priority, with new residential development to occur in a "contiguous and efficient manner". The City's *Comp Plan* calls for focusing retail and commercial development in the city's existing downtown core. It also encourages new housing developments to "incorporate natural and environmentally sensitive areas into design plans in an effort to provide for the preservation of open space and construction of a variety of housing options".

These priorities are reflected in the City-developed Sandy Bay Highlands residential subdivision, developed in 2003-24, where over 1/3 of the land area is preserved as open space and a bicycle/ pedestrian trail connects the subdivision to nearby established neighborhoods. The City has also secured State Department of Transportation (DOT) funding and is in the process of designing bike/ped trails to connect from the north and east sides of the city to its high school. These trails will serve areas of the community targeted for future housing development. This emphasis on keeping Two Rivers a "walkable/bikable" community is further reflected in the City's Bicycle and Pedestrian Facilities Plan, adopted in May of 2013.

The community has placed a high priority on using available redevelopment tools, including tax credits, TIF, and state and federal grants, to redevelop sites and re-purpose vacant, existing structures within the community. For instance, the former Two Rivers Community Hospital complex, redeveloped in 2001-02 into senior assisted living units and a skilled care facility, through planned unit development zoning and TIF assistance. This facility was vacated when Aurora Health Care built a new Two Rivers hospital and might have become a large "white elephant;" instead, it has been redeveloped as a vital part of the community and is on the tax rolls valued at \$6 million. The former Washington High School campus was redeveloped into a planned unit development with both condominiums and apartments. Riverfront areas of the site were improved as a public park area, featuring a playground, tennis courts, bike/ped trails and riverfront public access. Site clearance and infrastructure for this development was completed in 2002; the phased development is ongoing, with \$6 million in new private investment to date.

#### 4.c. Economic or non-Economic Benefits

4.c.i. Economic Benefits/Non-Economic Greenspace/NPO Benefits: Removal and/or redevelopment of the abandoned commercial and industrial sites located in the urban core of the City will reduce the disproportionate negative impact on home values in the surrounding neighborhoods, help encourage improved property values and homeowner equity in the area, and increase the tax base. The redevelopment of commercial buildings in the urban employment area will create mixed-use units that will provide additional housing opportunities and retail jobs. The redevelopment of industrial sites in the City will stimulate the local economy by providing new manufacturing job opportunities in a City with nearly 10% unemployment. With new job opportunities, these disenfranchised workers will be able to better support their families and invest in their community, improving living conditions in struggling neighborhoods, revitalizing the downtown, and further improving the tax base.

As brownfield sites are redeveloped as mixed-use professional, commercial, and residential units, the City's work force will diversify, attract additional service and retail development, and further revitalize the area, improving both the income and property tax base. Perhaps most importantly, the City will have a more heterogeneous economic base and workforce, rendering it less vulnerable to the swings in the economy and disproportionate impact from historic reliance on the manufacturing sector.

USEPA funding will also provide direct financial benefits to the City, to the extent the grant meaningfully stimulates redevelopment of brownfields, private investment, and the creation of jobs, resulting in property tax and utility revenues and an improved financial condition for the City. This will free up additional funds to support the brownfields program. Although the potential total economic benefits from brownfield redevelopment in Two Rivers are difficult to estimate, one measure would be the impacts from two current projects that will result in redevelopment and/or revitalization of brownfields totaling 13.7 acres in area. These projects (Fisher-Hamilton and Formrite industries) will result in an estimated \$11million in private investment and have the potential to create over 50 new full time jobs with benefits and a combined estimated annual payroll of at least \$4 million. If similar results were achieved on a per acre basis for just the 11 priority redevelopment/ brownfield sites totaling over 50 acres identified in the City's *Harbor Master Plan*, adopted in January 2013, an estimated \$100 million in private investment and increased tax base would be generated and approximately 500 new full time jobs with an annual payroll of more than \$30 million.

The assessment grant will reinvigorate the City's ongoing efforts to acquire and convert brownfields into green space (parks and trails), in particular, a recently developed and funded (\$1.5 million) continuous multi-modal trail extending from the Mariners Trail trailhead (at the boarder of Two Rivers and Manitowoc along Lake Michigan) through downtown to Neshota Beach on Lake Michigan. The City has also recently developed and funded projects (over \$12 million) to redevelop failing infrastructure and remove potentially contaminated sediments in and adjacent to the East Twin River. If brownfield properties are identified on or near these trail systems or development projects, the City will use assessment grant funds to assess potential environmental health threats prior to property acquisition and trail expansion. The City also envisions a substantial redevelopment opportunity which could include the creation of a neighborhood park across from the Fisher Hamilton site. No additional green space will be created that cannot be maintained or protected from potential environmental threats.

**4.c.ii.** Local Hiring and Procurement: The City will work closely with its partners, particularly, Lakeshore Technical College, the Economic Development Corporation of Manitowoc County and the Hmong Community Center, to promote local hiring and procurement during this project. Post-inventory and assessment bid solicitations will give preference to contractors that hire local workers and utilize local vendors. The City will facilitate a job fair to assist contractors, redevelopers, and others in sourcing local hires and vendors.

#### 5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

**5.a. Programmatic Capability:** Although the City has not previously been awarded a USEPA brownfield grant, the City of Manitowoc and their Senior Planner, Mr. David Less, have generously agreed to provide programmatic assistance to the City of Two Rivers as needed (see Letter of Support). Mr. Less has agreed to sit on the City's Steering Committee once the grant is awarded. Mr. Less will be an invaluable asset to the City since he is currently administrating a 2010 EPA Assessment Grant for the City of Manitowoc.

Greg Buckley will manage the grant and serve as the lead for the City's overall brownfields program. Mr. Buckley has been the City Manager for Two Rivers for the past 17 years, and has managed multiple State or Federal grants awarded to the City for brownfields assessment, planning, housing, and/or economic development. He has created and successfully administered a multi-million dollar revolving loan fund (RLF) program and led in the creation of nearly all of the City's TIF districts to date of which 11 are still active. He has been at the forefront of Two Rivers' redevelopment efforts, and has played a significant role in economic and environmental projects undertaken by the City. Jim Mc Donald, City Engineer and Public Works Director, will be actively involved throughout the project as well. Mr. Mc Donald has been involved in all major brownfields redevelopment initiatives and projects undertaken by the City. Mr. Buckley and Mr. Mc Donald have worked extensively with staff at the WDNR, the DCOMM, WEDC, and the USEPA on past grant projects related to brownfields sites in the City. Their combined experience leading both planning and economic development initiatives, and extensive experience with the full range of grant, TIF, RLF,

WDNR Clean Water, WDNR Safe Drinking Water, EPA GLRI, and other funding tools, provides an exceptional background for leveraging the greatest value presented by the unique opportunities presented by the USEPA's community-wide assessment grants.

Additionally, the City's Planning and Finance Departments will be actively involved in all aspects of the grant administration and tracking activities and Engineering Department can provide support for engineering, surveying, and design services required as part of the assessment, cleanup, and redevelopment process.

As described previously in the application, the City will retain the services of an environmental consulting firm (following the procurement process required under 40 CFR 31.36) to assist with implementation of the grant. The consulting firm retained will be required to have at least 3 project managers with past experience in implementing USEPA assessment grants to further enhance the City's ability to provide continuity in the event of turnover at either the City or the consulting firm.

**5.b. Audit Findings:** There have been no adverse audit findings related to administration of grants received by the City during at least the past 5 years. The comprehensive annual financial report for the Fiscal Year ending December 31, 2012, is available upon request.

5.c.ii. Past Performance and Accomplishments (No Previous EPA Brownfields Grant) Other Federal or Non-Federal Assistance Agreements: The City of Two Rivers has not previously been awarded a USEPA brownfields grant, but has been a recipient of numerous federal and State of Wisconsin funding or assistance agreements. The City has numerous examples of its technical ability to successfully carry out projects to achieve end goals. Examples of state or federally-funded projects include:

2011, \$1,200,000 grant, Congestion Mitigation & Air Quality (CMAQ), Multi-Modal Trail

Development. This DOT program provides funds for projects that encourage use of mass transit and nonmotorized modes of transportation in ozone "non-attainment counties." Two Rivers is using the funding for
two, connecting, off-street trails that will provide safe routes to schools, neighborhoods, and the East Twin
River. The project has selected a design consultant with a goal do bidding the project in 2015 and
construction completion in 2015 or 2016. City staff has received training and is certified to administer the
program. No compliance issues have been identified to date.

2012, \$1,631,000 grant, Wisconsin DOT Harbor Assistance Program (HAP), Dredging of the East Twin River. The East Twin River needed approximately 63,000 cubic yards of sediment dredged to deepen the navigational channel where limited water depths were causing hazardous boating conditions and had damaged commercial fishing boats and running gear. This project required compliance with local, state and federal permits and regulations, coordination with nine government and regulatory contacts within the city, county, WDNR WDOT, and USACE; and involved eleven different subcontractors. Work was completed ahead of schedule and all permits and the grant have been successfully closed out.

2012, \$870,000 grant, WDNR Recreational Boating Facilities (RBF), Blighted Sea Wall. Funding for this project, to replace a failing seawall, has been obtained in phases from several agencies and programs. The City obtained a \$54,000 grant from the Coastal Management Program (CMP) to prepare concept and design documents. The WDNR RBF program awarded two grants for a total of \$882,000 for the preliminary design and the final design and construction of the seawall; while a CDBG-PF grant of \$500,000 will help fund an underwater watermain re-construction in conjunction with the seawall. The CMP and one of the RBF grants, both funding preliminary phases of the project, have been completed. Both met reporting schedules and were kept in compliance with the contract conditions. The RBF has been successfully closed out and the CMP is in the process of closure. Currently the project is anticipated to be let for bid in March with construction to begin in April, 2014.

The City has been successful in achieving the fundamental goals of these and other funding programs, revitalizing brownfield sites, galvanizing private investment, and stimulating the creation of significant numbers of private jobs.

## APPENDIX A

Letter from Environmental Authority

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
101 S. Webster Street
Box 7921
Madison WI 53707-7921

Scott Walker, Governor Cathy Stepp, Secretary Telephone 608-266-2621 FAX 608-267-3579 TTY Access via relay - 711



January 2, 2014

Greg Buckley, City Manager City of Two Rivers 1717 East Park Street Two Rivers, WI 54241

Subject: State Support for \$400,000 U.S. EPA Brownfield Community-Wide Assessment Grant, City of Two Rivers, Combined Petroleum and Hazardous Substances

Dear Mr. Buckley:

The Wisconsin Department of Natural Resources is pleased to acknowledge and support the federal brownfield grant application referenced above for the city of Two Rivers.

The city of Two Rivers is a historically industrial community located on the shore of Lake Michigan, with the East Twin and West Twin Rivers meeting at the city harbor. The city has been significantly impacted by plant closings, including two Hamilton Fisher facilities as well as the closing of the neighboring Kewaunee Nuclear Plant.

Funding from an EPA Brownfields Assessment award will be used to conduct Phase I and II ESA's, along with remedial planning, at several brownfield sites within the city. Sites currently identified include: a) the recently closed Hamilton Fisher site on the East Twin River; b) the US Oil site on the West Twin River; c) the manufactured gas plant site adjacent to the US Oil site; d) an abandoned hotel property on the East Twin River; e) the Formrite site on the south side of the city's business district; f) and the Eggers Industries sites on both the East and West Twin Rivers.

I understand the city believes that the assessment and planning of these, and other sites identified with the help of an EPA assessment grant, will lead to significant future redevelopment and economic growth.

Obtaining an EPA Brownfield Assessment Grant, cleaning up and redeveloping brownfields is consistent with community needs, vital to the local economy and will help bring needed improvements to the quality of life for the city residents.

Sincerely,

Darsi Foss, Chief

Brownfields and Outreach Section

Bureau for Remediation and Redevelopment

cc: Bruce Urben - CO RR/5

Annette Weissbach - NER

Gwen Clendenning, Foth & Van Dyke



## APPENDIX B

Letters of Support from Community Based Organizations



WISCONSIN, USA www.manitowoc.org



January 21, 2014

Greg Buckley, City Manager City of Two Rivers 1717 Park Street Two Rivers WI 54241

Dear Mr. Buckley:

The City of Manitowoc is dedicated to being a regional leader in initiatives and projects to enhance the quality of life for the citizens and businesses in our community and along the lakeshore. Our cities have collaborated on multiple projects over the years, and we likewise share the economic pain and feel the impacts of plant closings such as Mirro in Manitowoc, the most recent closing of Thermo-Fisher in Two Rivers, the announced closing of the Kewaunee Nuclear Power Plant in 2013 and the loss of 650 jobs to our region, and the unknown fate in 2013 of the SS Badger with its cross lake connection with Ludington Michigan, and an estimated economic impact of that business in Wisconsin estimated at \$15 million. With the carferry able to transport 600 people cross-lake and about 180 vehicles at a time, its loss would have a substantial negative impact upon its port City of Manitowoc, and adjacent Two Rivers. While separate jurisdictions, the boundary between our cities is somewhat artificial as we share common economies, workforces, social and natural amenities, and our relationship is symbiotic.

The City of Manitowoc would like to express its strong support for the Two Rivers application to the US EPA for a 2014 Brownfield Site Assessment grant. As you know, we are benefiting from a 2011 EPA Assessment grant, and as we share the common characteristics of being old, industrial cities, the presence of brownfields in our historically industrial communities is substantial.

In closing, the City's 2011 EPA grant is administered by the City Planner and Deputy City Planner in our Planning Department. We are eager to support the City of Two Rivers in your effort, as this grant is much needed in your community, as we have discovered in ours. The City of Manitowoc will provide support and mentoring to Two Rivers as you move forward with the assessment, administration and reporting processes related to your EPA grant.

Mayor Justin M. Nickels - Phone (920) 686-6980 CITY HALL • 900 Quay Street • Manitowoc, WI 54220-4543 • Fax (920) 686-6989



# **CITY OF MANITOWOC**

WISCONSIN, USA www.manitowoc.org



Should you have any questions regarding this commitment, please do not hesitate to contact me directly.

Sincerely

ustin M. Nickels

Mayor

JMN:dl

M:\Mayor&Heather\Two Rivers\2014 Brownsfield Site Assessment Application Support Letter.docx



202 N 8th St - Ste 101 PO Box 813 Manitowoc, WI 54220 P: 920.482.0540 F: 920.682.6816 www.edcmc.org

January 21, 2014

Greg Buckley, City Manager City of Two Rivers City Hall Two Rivers, WI 54241

Dear Mr. Buckley:

The Economic Development Corporation of Manitowoc County is a private, non-profit economic development organization serving Two Rivers and the Manitowoc County area. As a community partner with Two Rivers, we eagerly support the application for and administration of the U.S. Environmental Protection Brownfields Coalition Site Assessment grant.

The Economic Development Corporation of Manitowoc County is comprised of public and private member investors collaborating to create a vibrant local economy and assisting businesses to start-up, grow and expand through connecting them to resources and information. Brownfield redevelopment is key to successfully providing a strong economic base and improving the image of the area to attract future development. This type of remediation is crucial to expanding the tax base and removing eye-sore properties that can be very detrimental to municipalities' economic health.

The Two Rivers community has been hit hard recently with several plant closure announcements and closings. Redevelopment of the vacant properties into new productive land use opportunities is crucial to reversing this downturn into a positive upswing in the economic growth and tax base maintenance.

Our organization will commit to serving on Advisory Committee to assist in Implementation. We will also assist in this project through communication distribution and assisting to identify properties that would be potential targets for assessment and redevelopment.

Again, we strongly support this application by the City of Two Rivers, and look forward to being involved in the process to improve our current property stock, by facilitating the redevelopment of brownfield sites.

Sincerely,

Connic Johan
Connie Loden
Executive Director



January 21, 2014

Greg Buckley, City Manager City of Two Rivers 1717 E. Park Street Two Rivers, WI 54241

RE: Letter of Support - USEPA Site Assessment Grant Application

Dear Mr. Buckley:

This letter is to inform you that the Bay-Lake Regional Planning Commission is in full support of the City of Two River's U.S. Environmental Protection Agency Site Assessment Grant application. The application for funding through USEPA fits within one of the primary planning principles of the regional planning commission and that is to promote maximum utilization of existing infrastructure for development and redevelopment opportunities. The Commission is a member of the Wisconsin Brownfields Coalition and is a partner with the Wisconsin Economic Development Corporation (WEDC) in its brownfield remediation and redevelopment efforts.

With the closure of the Fisher Hamilton Scientific Plant in 2012, as well as the shutdown of the Kewaunee Power Station in 2013 that is located just north of Two Rivers, this application and the initiative being undertaken by the city to identify, remediate, and redevelop underutilized properties are important steps in attracting new employers to the city, increasing recreational opportunities, and further expanding local amenities. The priority areas identified in the application are also consistent with the projects submitted by the City of Two Rivers for inclusion in the 2013 update to the Commission's adopted 2012 Comprehensive Economic Development Strategy (CEDS).

As a member of the Bay-Lake Regional Planning Commission, Commission staff are willing to assist the City of Two Rivers in any way possible to ensure that this project results in positive actions that lead to an increase in tax base and job creation. If you have any questions, or are in need of additional information, please do not hesitate to contact me at (920) 448-2820.

Respectfully,

Richard L. Heath
Executive Director

Copy to: File



# LAKESHORE GAP, ING.

Administrative Office:

Lakeshore CAP, Inc. 702 State Street P.O. Box 2315 Manitowoc, WI 54221-2315

PH: (920) 682-3737 PH: (800) 924-0510

**Door County** 

Lakeshore CAP, Inc. 131 S. 3<sup>rd</sup> Avenue P.O. Box 791 Sturgeon Bay, WI 54235-0791

PH: (920) 743-0192

Sheboygan County Lakeshore CAP, Inc.

1441 N. Taylor Drive. Suite 7 Sheboygan, WI 53081 PH: (920) 803-6991

#### Team Leaders:

Business Incubator / Skills Shirley Lau

CASA Julie Ribley

Community Services
Colleen Homb

Family Development Tracy Klesper

Finance Kathanie Strathmann

Food Security
Yvonne Sharlein

Housing Christine Loose

Chief Executive Officer
Michael Huck

Website: www.lakeshorecap.org





January 21, 2014

Greg Buckley, City Manager City of Two Rivers 1717 Park Street Two Rivers, WI 54241

Dear Mr. Buckley,

As you know, the mission of Lakeshore CAP is to increase economic self-sufficiency among the low income residents of Door, Kewaunee, Manitowoc, and Sheboygan Counties. This can be more easily accomplished against the back drop of a vibrant local economy. In light of the recent closures in the Two Rivers area, the fastest way to accomplish this is through re-development of existing commercial and industrial sites.

To this end, we support the application of the City of Two Rivers for a 2014 Brownfield Assessment Grant, and look forward to when new businesses explore locating their operations along the Lakeshore.

Please do not hesitate to contact me with any questions regarding this letter.

Sincerely,

Michael Huck

**CEO** 

Lakeshore Community Action Program



January 21, 2014

Mr. Greg Buckley City Manager City of Two Rivers 1717 East Park Street Two Rivers, WI 54241

RE: City of Two Rivers Application for EPA Brownfields Assessment Grant

Dear Mr. Buckley:

The Two Rivers Main Street Program supports the City's application for a U.S. EPA Brownfields Assessment Grant to inventory, prioritize and assess redevelopment sites around the community.

As a public/private partnership supported by both the City and by private property owners in the downtown business improvement district, Two Rivers Main Street appreciates the opportunities for redevelopment in the downtown and waterfront areas of this historic industrial community.

We also recognize that with those opportunities come environmental challenges related to that industrial legacy. The Brownfields Assessment Grant will provide needed resources to tackle some of Two Rivers' priority redevelopment sites, several of which are located within or adjacent to the downtown business district.

Our community has a track record of successfully addressing redevelopment projects, helping to keep the core of the city attractive and economically viable. The recently-adopted Smart Growth Comprehensive Plan, Harbor Master Plan, Bicycle and Pedestrian Facilities Plan all reflect a commitment to laying the groundwork for more redevelopment in the future.

Two Rivers Main Street applauds the City's efforts to secure this funding. The Main Street Board and I look forward to a continued role as active partners in the redevelopment of our community.

Sincerely,

Matt Hohner

**Executive Director** 



# Woodland Dunes Nature Center And Preserve POBox 486, Two Rivers, WI 54241 920-793-4007 woodlanddunes.org

Greg Buckley, City Manager City of Two Rivers 1717 Park Street Two Rivers WI 54241 January 21, 2014

Dear Mr. Buckley:

On behalf of Woodland Dunes Nature Center and Preserve, I would like to express our strong support for the City of Two River's application for a 2013 Brownfield Site Assessment grant.

For nearly 40 years our non-profit organization, founded by a local bird researcher, has worked to preserve and manage nearly 1,200 acres of forested wetlands (ridge and swale habitat considered of global ecological significance), marsh, and sedge meadow habitat near the West Twin River adjacent to the City. Each year about 5,000 people attend family and school environmental education programs at our facility. In addition to its value as wildlife habitat, our preserve also serves to enhance the quality of life for citizens of Two Rivers. Our nearly 600 members and many visitors feel the same way- that our natural resources should be appreciated, protected, and restored where possible. Our preserve does not exist in a vacuum- it is linked as all ecosystems are to the surrounding landscape.

Two Rivers has a number of sites, remnants of a time when natural resources were not protected, which are in need of assessment so that plans for remediation can be developed if warranted. Not only is this likely to contribute to enhanced health and well-being in the community, but would also aid in future economic redevelopment efforts.

Woodland Dunes would be willing to contribute staff/member time to assist with an advisory committee, and would offer the use of our facilities to host meetings and the like.

We applaud the City's efforts to secure funding for this project, and hope that the project is indeed funded under this program.

James Knickellen.

Please feel free to contact me if you have any questions.

Sincerely,

James Knickelbine Executive Director



# HMONG COMMUNITY CENTER, INC.

#### Or Manitowoc County A NONPROFIT ORGANIZATION 501 (c) 3

November 27, 2012

Mr. Greg Buckley City Manager City of Two Rivers Two Rivers, W154220

Dear Mr. Greg Buckley;

The Hmong Community Center, Inc. of Manitowoc County (HCCI) is a not-for-profit grass roots organization that was established in 1989, with a 9 member board, 2 full-time and 4 part-time staff. The HCCI is the primary advocacy group for the Hmong community in the City of Two Rivers and Two Rivers County, and in 2002 purchased its own building at 1517 Washington Street that serves as a "physical" community center. The HCCI has a significant interest in brownfields issues because brownfield property is one of the most significant property in Two Rivers-the former Fisher Hamilton Plant. Many members of the Hmong community live in the neighborhoods surrounding this plant and are impacted by the blighting effect it has on the area as well as undetermined health and other risks. Our members also use of the rivers in Two Rivers as a source of recreation including fishing and fish consumption of fish from the east and West Twin Rivers. We would greatly support funding from EPA that could help to address this and similar sites in the City.

Please note that the HCCI is part of a Two Rivers/Manitowoc area consortium of over 25 local grass roots organizations and service providers that meet monthly and work together to address the needs of the minority communities and other local residents. If brownfields funding is awarded by EPA to the City, the HCCI will partner with the City in implementing the grants by providing the following types support or assistance: (a) having a staff member serve on the brownfield advisory committee, (b) hosting one or more neighborhood meetings related to the Fisher Hamilton brownfield site (c) distribution of information related to the brownfields program to the Hmong community through a variety of communication methods, including translation into Hmong for select materials, and (d) distribution of information to other grass roots organizations and service providers via the consortium.

We look forward to embracing these opportunities and collaborating with the City on projects generated by these grants.

Sincerely,

NyiaLong Yang Executive Director

> 1523 Washington Street, Manitowoc, WI 54220 Phone: (920) 684-1228; Fax: (920) 267-6277 nyang@hmongcommunity.org